

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PETER M. GALLIGAN,

Plaintiff,

v.

ADTALEM GLOBAL EDUCATION INC.,
f/k/a DEVRY EDUCATION GROUP;
ADTALEM GLOBAL HEALTH, INC. f/k/a
DEVRY MEDICAL INTERNATIONAL,
INC.; ROSS UNIVERSITY SCHOOL OF
MEDICINE SCHOOL OF VETERINARY
MEDICINE (ST. KITTS) LIMITED; and
DOES 1 THROUGH 50

Defendants.

Case No. 1:17-cv-06310

Hon. Joan H. Lefkow

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
MOTION TO DISMISS, REQUEST FOR A BRIEFING SCHEDULE, AND
POSTPONEMENT OF THE MARCH 27, 2019 HEARING**

Defendants Adtalem Global Education Inc. (ATGE), Adtalem Global Health, Inc. (AGH), and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited (Ross or RUSVM) (collectively, "Defendants") respectfully move for a two-week extension of time to file their motion to dismiss, request a briefing schedule, and request a postponement of the March 27, 2019 hearing. In support of these unopposed requests, Defendants state as follows:

1. On February 4, 2019, the Court granted in part and denied in part Defendants' motion to dismiss Plaintiff's Second Amended Complaint. (ECF No. 48.)
2. On February 19, 2019, the Court set a status hearing for March 27, 2019 at 9:30 AM. (ECF No. 52.)

3. On March 8, 2019, Plaintiff Peter Galligan (“Plaintiff”) filed a motion for leave to file a Third Amended Complaint (“TAC”). (ECF No. 53.)

4. The Court granted Plaintiff’s motion for leave and Plaintiff filed his TAC on March 11, 2019. (ECF Nos. 56, 57.)

5. Pursuant to Fed. R. Civ. P. 15(a)(3), Defendants’ responsive pleading deadline is March 25, 2019.

6. Defendants intend to move to dismiss in part Plaintiffs’ TAC.

7. The parties conferred about Defendants’ request for an extension of time, proposed briefing schedule, and request to strike the March 27, 2019 status hearing on March 11, 13, and 20, 2019. Plaintiff does not oppose Defendants’ request.

8. The parties have conferred about a proposed briefing schedule for the motion to dismiss and propose as follows: (1) Defendants’ Motion to Dismiss due April 8, 2019; (2) Plaintiff’s Response in Opposition due May 5, 2019; and (3) Defendants’ Reply due May 22, 2019. The parties also request that the Court strike the status hearing currently scheduled for March 27, 2019 to be rescheduled for a date following the completion of briefing.

9. This is the first request for an extension of time in connection with Defendants’ motion to dismiss Plaintiffs’ TAC. This request is made in good faith and not for purposes of delay.

WHEREFORE, Defendants respectfully request that the Court extend the deadline for Defendants to file their motion to dismiss Plaintiffs' Third Amended Complaint by two weeks and enter the following briefing schedule:

Action	Deadline
Defendants' Motion to Dismiss	4/8/2019
Plaintiff's Response in Opposition	5/8/2019
Defendants' Reply	5/22/2019
3/27/2019 Status Hearing is Cancelled	To Be Rescheduled At A Future Date Following Briefing

DATED: March 20, 2019

Respectfully submitted,

ADTALEM GLOBAL EDUCATION INC.;
ADTALEM GLOBAL HEALTH, INC.; ROSS
UNIVERSITY SCHOOL OF MEDICINE
SCHOOL OF VETERINARY MEDICINE
(ST. KITTS) LIMITED

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CERTIFICATE OF SERVICE

I do hereby certify that I have caused a true and correct copy of the foregoing by filing a copy with the Court's CM/ECF system, which will send notification to the following, on this 20th day of March 2019:

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